

**INDIANA DEPARTMENT OF ENVIRONMENTAL  
MANAGEMENT  
OFFICE OF AIR QUALITY  
and  
INDIANAPOLIS OFFICE OF ENVIRONMENTAL  
SERVICES**

**NEW SOURCE CONSTRUCTION PERMIT  
and MINOR SOURCE OPERATING PERMIT**

**Qwest Communications  
731 W. Henry Street  
Indianapolis, Indiana 46225**

(herein known as the Permittee) is hereby authorized to construct and operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-5.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 097-15399-00421	
Issued by:  Jodi Perras Kusmar Acting Administrator Office of Environmental Services	Issuance Date: 04-03-02  Expiration Date: 04-03-07

## TABLE OF CONTENTS

<b>A</b>	<b>SOURCE SUMMARY</b> .....	<b>3</b>
A.1	General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]	
A.2	Emission Units and Pollution Control Equipment Summary	
<b>B</b>	<b>GENERAL CONSTRUCTION CONDITIONS</b> .....	<b>4</b>
B.1	Permit No Defense [IC 13]	
B.2	Definitions	
B.3	Effective Date of the Permit [IC 13-15-5-3]	
B.4	Modification to Permit [326 IAC 2]	
B.5	Minor Source Operating Permit Renewal [326 IAC 2-6.1]	
<b>C</b>	<b>SOURCE OPERATION CONDITIONS</b> .....	<b>5</b>
C.1	PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]	
C.2	Preventive Maintenance Plan [326 IAC 1-6-3]	
C.3	Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]	
C.4	Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]	
C.5	Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]	
C.6	Permit Revocation [326 IAC 2-1-9]	
C.7	Opacity [326 IAC 5-1]	
	<b>Testing Requirements</b>	
C.8	Performance Testing [326 IAC 3-6]	
	<b>Compliance Monitoring Requirements</b>	
C.9	Compliance Monitoring [326 IAC 2-1.1-11]	
C.10	Monitoring Methods [326 IAC 3]	
	<b>Record Keeping and Reporting Requirements</b>	
C.11	Malfunctions Report [326 IAC 1-6-2]	
C.12	Annual Emission Statement [326 IAC 2-6]	
C.13	Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-3]	
C.14	General Record Keeping Requirements [326 IAC 2-6.1-2]	
C.15	Annual Notification [326 IAC 2-6.1-5(a)(5)]	
<b>D.1</b>	<b>EMISSIONS UNIT OPERATION CONDITIONS - Three Emergency Generators</b> .....	<b>12</b>
	<b>Emission Limitations and Standards</b>	
D.1.1	Opacity Limitations [326 IAC 5-1]	
	<b>Compliance Determination</b>	
D.1.2	Potential to Emit	
	<b>Annual Notification</b> .....	<b>13</b>
	<b>Malfunction Report</b> .....	<b>14</b>

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary telecommunications site with three emergency generators.

Authorized Individual: Jeff Ross  
Source Address: 731 W. Henry Street, Indianapolis, Indiana 46225  
Mailing Address: 1801 California, Suite 3800, Denver, Colorado 80202  
Phone Number: Source Contact: Mike Hughes, Lead Operations Technician  
(317)488-9253  
SIC Code: 4813  
County Location: Marion  
County Status: Attainment for all criteria pollutants  
Source Status: Minor Source Operating Permit  
Minor Source, under PSD;  
Minor Source, Section 112 of the Clean Air Act

### A.2 Emissions units and Pollution Control Equipment Summary

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This stationary source is approved to construct and operate the following emissions units and pollution control devices:

- (a) Three (3) Cummins Onan diesel fueled emergency generators identified as emission units 1, 2, and 3. The emergency generators each have an output of 2220 hp and a calculated heat input of 15 MMBtu per hour. The generators were constructed in 2000 and began operations in March, 2001.

**SECTION B GENERAL CONSTRUCTION CONDITIONS**

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

**B.1 Permit No Defense [IC 13]**

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This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

**B.2 Definitions**

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

**B.3 Effective Date of the Permit [IC13-15-5-3]**

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Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

**B.4 Modification to Permit [326 IAC 2]**

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Notwithstanding the Section B condition entitled "Minor Source Operating Permit", all requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

**B.5 Minor Source Operating Permit Renewal [326 IAC 2-6.1]**

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Pursuant to 326 IAC 2-6.1-7, an operating permit shall be valid for a period of time not to exceed five (5) years. However, permits may be valid for any lesser period if determined necessary for administrative reasons by IDEM OAQ or OES. At least ninety (90) calendar days prior to the expiration date of an operating permit, the applicant shall apply for a new operating permit from OES. If a timely and sufficient application for renewal has been made, the existing permit does not expire until a final decision on the application for renewal has been made by the department. The application for the operating permit renewal shall include the following information:

- (a) Certification that the source has not changed from the initial permit issuance or that all modifications to the source have been reviewed and approved in accordance with this rule.
- (b) Identification of any changes to the source that are subject to this article that have not received approval prior to construction or operation.

**SECTION C**

**SOURCE OPERATION CONDITIONS**

Entire Source
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**C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]**

- (a) The total source potential to emit of each criteria pollutant is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.
- (b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.
- (c) Any change or modification which may increase potential to emit to 10 tons per year of any single hazardous air pollutant, twenty-five tons per year of any combination of hazardous air pollutants, or 100 tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAQ and OES prior to making the change.

**C.2 Preventive Maintenance Plan [326 IAC 1-6-3]**

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) after issuance of this permit, including the following information on each emissions unit:
  - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, and OES upon request and shall be subject to review and approval by IDEM, OAQ, and OES. IDEM, OAQ, and OES may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

**C.3 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]**

- (a) The Permittee must comply with the requirements of 326 IAC 2-6.1-6 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

C.4 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, the Indianapolis OES, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

C.5 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch and Indianapolis OES within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, and Indianapolis OES shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.6 Permit Revocation [326 IAC 2-1-9]

Pursuant to 326 IAC 2-1-9(a)(Revocation of Permits), this permit to construct and operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM and Indianapolis OES the fact that continuance of this permit is not consistent with purposes of this article.

**C.7 Opacity [326 IAC 5-1]**

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Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**Testing Requirements**

**C.8 Performance Testing [326 IAC 3-6]**

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- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ, and Indianapolis OES within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, and Indianapolis OES, if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "authorized

individual" as defined by 326 IAC 2-1.1-1.

### **Compliance Monitoring Requirements**

#### **C.9 Compliance Monitoring [326 IAC 2-1.1-11]**

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Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

#### **C.10 Monitoring Methods [326 IAC 3]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

### **Record Keeping and Reporting Requirements**

#### **C.11 Malfunctions Report [326 IAC 1-6-2]**

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Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and OES or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

#### **C.12 Annual Emission Statement [326 IAC 2-6]**

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be

submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

Indianapolis Office of Environmental Services  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221

- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Indianapolis OES on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

**C.13 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]**

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- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM, OAQ and Indianapolis OES may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.
- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

**C.14 General Record Keeping Requirements [326 IAC 2-6.1-2]**

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- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, and Indianapolis OES representative. The records may be stored elsewhere for the remaining two (2)

years as long as they are available upon request. If the Administrator makes a written request for records to the Permittee, the Permittee shall furnish the records to the Administrator within a reasonable time.

- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented when operation begins.

**C.15 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

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- (a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.
- (b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.
- (c) The annual notification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of

each year to:

Compliance Branch, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

and

Indianapolis Office of Environmental Services  
Air Compliance  
2700 South Belmont Avenue  
Indianapolis, IN 46221

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and Indianapolis OES on or before the date it is due.

## SECTION D.1

## EMISSIONS UNIT OPERATION CONDITIONS

### Facility Description [326 IAC 2-6.1-5]:

Three (3) Cummins Onan diesel fueled emergency generators identified as emission units 1, 2, and 3. The emergency generators each have an output of 2220 hp and a calculated heat input of 15 MMBtu per hour. The generators were constructed in 2000 and began operations in March, 2001.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards

#### D.1.1 Opacity Limitations [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### Compliance Determination

#### D.1.2 Potential to Emit

Pursuant to 326 IAC 2-1.1-1 (Permit Review Rules), potential to emit shall be based on the operation of each emergency generator not exceeding 500 annual operating hours.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<b>Company Name:</b>	<b>Qwest Communications</b>
<b>Address:</b>	<b>731 W. Henry Street</b>
<b>City:</b>	<b>Indianapolis, IN 46225</b>
<b>Phone #:</b>	<b>(317)488-9253</b>
<b>MSOP #:</b>	<b>097-15399-00421</b>

I hereby certify that the source is ☒ still in operation.  
☐ no longer in operation.

I hereby certify that the source is ☒ in compliance with the requirements of MSOP **097-15399-00421**.  
☐ not in compliance with the requirements of MSOP **097-15399-00421**.

<b>Authorized Individual (typed):</b>
<b>Title:</b>
<b>Signature:</b>
<b>Date:</b>

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>

## **MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
FAX NUMBER - 317 233-5967  
Indianapolis Office of Environmental Services  
FAX NUMBER - 317 327-2274**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6  
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?\_\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ?\_\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES? X, 25 TONS/YEAR VOC ?\_\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ?\_\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?\_\_\_\_\_, 25 TONS/YEAR FLUORIDES ?\_\_\_\_\_, 100TONS/YEAR CARBON MONOXIDE ?\_\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?\_\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?\_\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERMIT LIMIT OF \_\_\_\_\_

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ?    Y        N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ?    Y        N

COMPANY: Qwest Communication  
PHONE NO. ( 317 ) 488-9253  
LOCATION: (CITY AND COUNTY) Indianapolis, Indiana, Marion County  
PERMIT NO. 097-15399-00421 AFS PLANT ID: \_\_\_\_\_ AFS POINT ID: \_\_\_\_\_  
INSP: \_\_\_\_\_  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_/\_\_\_\_/20\_\_\_\_        AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_/\_\_\_\_/20\_\_\_\_        AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO<sub>2</sub>, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_  
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_  
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_  
INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

**Please note - This form should only be used to report malfunctions**

### 326 IAC 1-6-1 Applicability of rule

### 326 IAC 1-2-39 “Malfunction” definition

**\*Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

[illegible]

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
Indianapolis Office of Environmental Services**

Addendum to the  
Technical Support Document for a Minor Source Operating Permit

**Source Name:** Qwest Communications  
**Source Location:** 731 W. Henry Street, Indianapolis,  
Indiana 46225  
**County:** Marion  
**SIC Code:** 4813  
**Operation Permit No.:** 097-15399-00421  
**Permit Reviewer:** Amanda Hennessy

On February 12, 2002 the Indiana Department of Environmental Management, Office of Air Quality (OAQ) and the Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that Qwest Communications International, Inc. had applied for a Minor Source Operating Permit (MSOP) for the operation of three emergency generators. The notice also stated that OES proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

The bold language is new language that has been added and the language with a line through it (strikeout) has been taken out. The bold and strikeouts are only being used in this addendum to emphasize the change being made.

On February 21, 2002, Qwest Communications submitted comments on the proposed MSOP permit. The summary of the comments is as follows:

**Comment 1:**

Permit Page 3: Section A.1 General Information

Qwest Communications indicated that the mailing address is Denver, CO rather than Indianapolis, IN.

**Response to Comment 1:**

The following will be changed in the permit:

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary telecommunications site with three emergency generators.

Authorized Individual: Jeff Ross  
Source Address: 731 W. Henry Street, Indianapolis, Indiana 46225  
Mailing Address: 1801 California, Suite 3800, ~~Indianapolis, Indiana~~ **Denver, Colorado** 80202  
Phone Number: Source Contact: Mike Hughes, Lead Operations Technician  
(317)488-9253  
SIC Code: 4813  
County Location: Marion  
County Status: Attainment for all criteria pollutants  
Source Status: Minor Source Operating Permit  
Minor Source, under PSD;  
Minor Source, Section 112 of the Clean Air Act

Due to staff changes, OES and OAQ have agreed to the following change to the final MSOP:

Page 1 of the Permit

Operation Permit No.: MSOP 097-15399-00421	
Issued by:  <del>Barbara Lawrence</del> <b>Jodi Perras Kusmar</b> Acting Administrator Office of Environmental Services	Issuance Date:   Expiration Date:

No other changes are being made in the permit and the TSD remains as it was during public notice.

**Indiana Department of Environmental Management  
Office of Air Quality  
and  
Indianapolis Office of Environmental Services**

**Technical Support Document (TSD) for a New Source Construction and  
Minor Source Operating Permit**

**Source Background and Description**

**Source Name:** Qwest Communications  
**Source Location:** 731 W. Henry Street, Indianapolis, IN 46225  
**County:** Marion County  
**SIC Code:** 4813  
**Operation Permit No.:** 097-15399-00421  
**Permit Reviewer:** Amanda Hennessy

The Indianapolis Office of Environmental Services (OES) and the IDEM Office of Air Quality (OAQ) have reviewed an application from Qwest Communications relating to the construction and operation of three (3) emergency generators.

**Permitted Emission Units and Pollution Control Equipment**

There are no permitted emission units at this source.

**Unpermitted Emission Units and Pollution Control Equipment**

The source consists of the following unpermitted facilities/units:

- (a) Three (3) Cummins Onan diesel fueled emergency generators identified as emission units 1, 2, and 3. The emergency generators each have an output of 2220 hp and a calculated heat input of 15 MMBtu per hour. The generators were constructed in 2000 and began operations in March, 2001.

**Stack Summary**

Stack ID	Operation	Height above ground (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
1	emergency generator	14	1	10,650	960
2	emergency generator	14	1	10,650	960
3	emergency generator	14	1	10,650	960

**Enforcement Issue**

- (a) OES and OAQ are aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*.

- (b) OES is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

### Recommendation

The staff recommends to the Administrator that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on December 13, 2001.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A page 1).

### Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)*
PM	1.1
PM-10	0.6
SO <sub>2</sub>	4.5
VOC	1.0
CO	19.6
NO <sub>x</sub>	36.0
Single HAP	Negligible
Combination of HAPs	Negligible

\* PTE for emergency generators is calculated at 500 hours per year.

- (a) This source is subject to the requirements to obtain a construction permit under 326 IAC 2-1.1-3 and a minor source operating permit under 326 IAC 2-6.1 because:
- (1) it is a new source with a potential to emit of Nitrogen oxides (NO<sub>x</sub>) greater than 25 tons per year;
  - (2) with a potential to emit of any single hazardous air pollutant less than 10 tons per year; and
  - (3) a potential to emit a combination of any hazardous air pollutants less than 25 tons per year.

Qwest Communications' Henry Street location has a potential to emit of NO<sub>x</sub> of 36 tons per year, based on 500 hours of operation per year. HAP emissions from this source are negligible.

### Actual Emissions

No previous emission data has been received from the source.

## County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	unclassifiable
SO <sub>2</sub>	maintenance attainment
NO <sub>2</sub>	attainment
Ozone	maintenance attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Marion County has been classified as maintenance attainment, attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

## Source Status

New Source PSD Definition (emissions after controls, based on 500 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	1.1
PM10	0.6
SO <sub>2</sub>	4.5
VOC	1.0
CO	9.6
NO <sub>x</sub>	36.0
Single HAP	negligible
Combination HAPs	negligible

- (a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.
- (b) This source is subject to the requirements to obtain a construction permit under 326 IAC 2-1.1-3 and a minor source operating permit under 326 IAC 2-6.1 because it is a new source with a potential to emit of Nitrogen oxides (NO<sub>x</sub>) greater than 25 tons per year. Qwest Communications' Henry Street location has a potential to emit of NO<sub>x</sub> of 36 tons

per year, based on 500 hours of operation per year.

## Part 70 Permit Determination

### 326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

## Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.

## State Rule Applicability - Entire Source

### 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)

This new source is not subject to this rule since it does not have the potential to emit 10 or more tons per year of any single hazardous air pollutant or 25 tons per year of any combination of hazardous air pollutants.

### 326 IAC 2-5.1-3 ( Permits) and 326 IAC 2-6.1 (Minor Source Operating Permit)

This source is subject to the requirements to obtain a construction permit under 326 IAC 2-1.1-3 and a minor source operating permit under 326 IAC 2-6.1 because it is a new source with a potential to emit of Nitrogen oxides (NO<sub>x</sub>) greater than 25 tons per year. Qwest Communications' Henry Street location has a potential to emit of NO<sub>x</sub> of 36 tons per year, based on 500 operating hours per year.

### 326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of NO<sub>x</sub> and is located in Marion County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15th of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

### 326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### **State Rule Applicability - Individual Facilities**

#### **326 IAC 6-1 (Nonattainment Area Limitations)**

Qwest Communications is not subject to the limits of 326 IAC 6-1 (Nonattainment Area Limitations) for Particulate Matter since the PTE of particulate matter is less than 100 tons per year and actual particulate matter emissions will be less than 10 tons per year.

#### **326 IAC 6-3 (Process Operations)**

Pursuant to 326 IAC 1-2-59, process weight does not include liquid or gaseous fuels, therefore 326 IAC 6-3-2 does not apply to these units.

#### **326 IAC 7.1 (Sulfur Dioxide Emission Limitations)**

Qwest Communications potential to emit SO<sub>2</sub> is less than 25 tons per year, therefore 326 IAC 7.1 (Sulfur Dioxide Emission Limitations) does not apply.

### **Conclusion**

The construction and operation of these emergency generators shall be subject to the conditions of the attached proposed **New Source Construction and Minor Source Operating Permit 097-15399-00421**.

**Appendix A: Emission Calculations**  
**Internal Combustion Engines - Diesel Fuel**  
**Turbine or Reciprocating Engine (>600 HP)**

Page 1 of 1 TSD App A

**Company Name:** Qwest Communications  
**Address City IN Zip:** 731 Henry Street, Indianapolis, IN 46225  
**OP#:** 97-15399-421  
**Reviewer:** AJH  
**Date:** January, 2002

**A. Emissions calculated based on heat input capacity (MMBtu/hr)**

Emissions below are for each emergency generator. The source consists of three identical generators.

Emissions calculated based on 500 hours of operation per year based on EPA memo dated September 6, 1995.

Heat Input Capacity  
MM Btu/hr

S=  = WEIGHT % SULFUR

Emission Factor in lb/MMBtu	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	0.1	0.0573	0.4 (1.01S)	3.2 **see below	0.1	0.85
Potential Emission in tons/yr	0.4	0.2	1.5	12.0	0.3	3.2

\*\*NOx emissions: uncontrolled = 3.2 lb/MMBtu, controlled with ignition timing retard = 1.9 lb/MMBtu

**B. Total Emissions for all three boilers**

	PM*	PM10*	SO2	NOx	VOC	CO
Potential Emissions in tons/yr	1.1	0.6	4.5	36.0	1.0	9.6

**Methodology**

Potential Throughput (hp-hr/yr) = hp \* 8760 hr/yr

Emission Factors are from AP 42 (Supplement B 10/96) Table 3.4-1 and Table 3.4-2

1 hp-hr = 7000 Btu, AP42 (Supplement B 10/96), Table 3.3-1, Footnote a.

Emission (tons/yr) = [Heat input rate (MMBtu/hr) x Emission Factor (lb/MMBtu)] \* 8760 hr/yr / (2,000 lb/ton)

Emission (tons/yr) = [Potential Throughput (hp-hr/yr) x Emission Factor (lb/hp-hr)] / (2,000 lb/ton)

\*No information was given regarding which method was used to determine the PM emission factor or whether condensable PM is included. The PM10 emission factor is filterable and condensable PM10 combined.

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Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

updated 4/99